REMARKS/ARGUMENTS

Claim 7 was objected to. Claims 1 to 2, 5 to 6, 8, and 11 to 12 were rejected under 35 U.S.C. § 112, second paragraph as indefinite. Claim 2 was rejected under 35 U.S.C. § 101. Claims 1 to 10, and 12 were rejected under 35 U.S.C. § 103 (a) as being unpatentable over Nguyen et al. (US 6,983,232) in further view of Herman (US 2001/0034592).

Claims 1, 2, 5, 7, 11 and 12 have been amended.

Reconsideration of the application is respectfully requested.

Claim Objections

Claim 7 was objected to. Claim 7 has been amended to remove the numbering. Withdrawal of the objection is respectfully requested.

35 U.S.C. 112 Rejections

Claims 1 to 2, 5 to 6, 8, and 11 to 12 were rejected under 35 U.S.C. § 112, second paragraph as indefinite.

The claims have been amended to remove the "and/or" which due to the open comprising limitation is the equivalent of "or" as now claimed.

Withdrawal of the rejections is respectfully requested.

35 U.S.C. 101 Rejections

Claim 2 was rejected under 35 U.S.C. § 101.

Claim 2 has been amended to recite the steps in the link calculation with reference to a use.

Withdrawal of the rejection to claim 2 is respectfully requested.

35 U.S.C. 103 Rejections

Claims 1 to 10, and 12 were rejected under 35 U.S.C. § 103 (a) as being unpatentable over Nguyen et al. (US 6,983,232) in further view of Herman (US 2001/0034592).

Nguyen describes a customer benefit tool which allows customer models to be validated under acceptance test conditions to ensure that the machine based processes and cycle times have

been accurately modeled. Col. 2, lines 51 to 54. A user proposed a configuration for an assembly line by selecting objects that represent assembly line equipment, the objects having specific values for operating characteristics. "The configuration and associated operating characteristic values are then used to build a discrete event simulation."

In the embodiments discussed in the office action, "building a discrete event simulation requires creating detailed simulation objects. To streamline the building of a simulation by selecting and arranging the simulation objects, templates may be created and values may be read into the template to create the simulation object." These simulation objects can also be formed using designer objects and templates, as noted in column 5, line 56 to column 6, line 1.

Claim 1 recites a method for simulating process flows in the graphics industry and for displaying the result calculated in the simulated process flows and/or intermediate results, comprising the steps of:

inputting or selecting at least one order data set;

inputting or selecting at least one process data set;

calculating links between the order data set and the process data set as a function of the order data set and the process data set;

creating a process flow from the calculated links;

calculating a result or intermediate results for the process flow using the order data set; and

outputting the result or intermediate results.

There is no teaching or disclosure in Nguyen of "calculating links between the order data set and the process data set as a function of the order data set and the process data set" as claimed in claim 1.

The values which are entered into the template in Nguyen to create a simulation object are the values associated with a piece of equipment (see col 3, lines 5 to 7 and col. 7, 57 to 67: "values that correspond to specific operating parameters for that piece of equipment.")

The template is used to form solely information on the operating parameters of the equipment, and does not "calculate links between the order data set and the process data set" as claimed at all.

The acceptance test only ensures "that the machine based processes and cycle times have been accurately modeled." See col. 2, lines 51 to 54. No links are calculated to its data, and its data is not even "order data" as it is not for an order at all.

In addition, it is respectfully submitted that it would not have been obvious to have combined Herman with Nguyen as the acceptance test is merely a check on the modeling, not a run through the model.

Withdrawal of the rejection to claim 1 and its dependent claims is respectfully requested.

With further respect to claim 2, none of these steps are performed in Nguyen as no links are calculated at all. Where is the establishing of a ranking as claimed?

With further respect to claim 3, none of these steps are disclosed as well. Where is a best linkage created in Nguyen?

With respect to claim 12, Nguyen does not have any device suitable for calculating links as claimed.

Withdrawal of the rejection to claims 1 to 10 and 12 is respectfully requested.

CONCLUSION

The present application is respectfully submitted as being in condition for allowance and applicants respectfully request such action.

Respectfully submitted,
DAVIDSON, DAVIDSON & KAPPEL, LLC

By: _____
William C. Gehris
Reg. No. 38,156

Davidson, Davidson & Kappel, LLC
485 Seventh Avenue
New York, New York 10018
(212) 736-1940